

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CWB SERVICES, LLC, *et al.*,

Defendants.

Case No. 4:14-cv-00783-W-DW

**JOINT MOTION TO ENTER
STIPULATED PERMANENT
INJUNCTION AND MONETARY
JUDGMENT AS TO DEFENDANTS
VANDELIER GROUP LLC; ST.
ARMANDS GROUP LLC; ANASAZI
GROUP LLC; ANASAZI SERVICES
LLC; LONGBOAT GROUP LLC, ALSO
D/B/A CUTTER GROUP; OREAD GROUP
LLC, ALSO D/B/A MASS STREET
GROUP; AND FRAMPTON T.
ROWLAND, III**

Plaintiff Federal Trade Commission (“FTC”) and Defendants Vandelier Group LLC; St. Armands Group LLC; Anasazi Group LLC; Anasazi Services LLC; Longboat Group LLC, also d/b/a Cutter Group; Oread Group LLC, also d/b/a Mass Street Group; and Frampton T. Rowland, III, with the consent of the Receiver, respectfully request that the Court enter a Stipulated Permanent Injunction and Monetary Judgment in the form of the attachment hereto for the following reasons:

1. As more fully described in the terms of the Stipulated Permanent Injunction and Monetary Judgment, the parties have reached agreement on a stipulated permanent injunction and monetary judgment resolving the FTC’s claims against the above-named Defendants;
2. The court-appointed Receiver does not object to entry of the stipulated permanent injunction and monetary judgment; and

3. The entry of the stipulated permanent injunction and monetary judgment promotes the orderly resolution of controversy and judicial economy, and is in the public interest.

WHEREFORE, Plaintiff and the above-named Defendants move the Court to enter the final judgment as to the above-named Defendants.

Respectfully submitted,

/s/ Matthew J. Wilshire

Matthew J. Wilshire, DC Bar #483702
Lisa A. Rothfarb, MD Bar
Federal Trade Commission
600 Pennsylvania Ave., N.W., Mail Stop CC-10232
Washington, D.C. 20580
202-326-2976 (Wilshire)
mwilshire@ftc.gov, lrothfarb@ftc.gov

Dated: July 7, 2015

/s/ Charles M. Thomas

Charles M. Thomas, MO Bar #28522
Assistant United States Attorney
Charles Evans Whittaker Courthouse
400 East Ninth Street, Room 5510
Kansas City, MO 64106
Telephone: (816) 426-3130
Facsimile: (816) 426-3165
E-mail: charles.thomas@usdoj.gov

Dated: July 7, 2015

Attorneys for Plaintiff Federal Trade Commission

/s/ Philip G. Greenfield
Phillip G. Greenfield, MO #37457
Paul M. Flucke, MO #64849
Rouse, Hendricks, German, May, PC
1201 Walnut Street, 20th Floor
Kansas City, MO 64106
Telephone: (816) 471-7700
Fax: (816) 471-2221
Email: philg@rhgm.com, paulf@rhgm.com

Dated: July 7, 2015

Attorneys for Defendants Frampton T. Rowland, III; Anasazi Services LLC; Anasazi Group LLC; Vandelier Group LLC; St. Armands Group LLC; Oread Group LLC d/b/a Mass Street Group; Longboat Group LLC d/b/a Cutter Group

/s/ Brian M. Holland
Brian M. Holland, MO # 51307
Lathrop & Gage LLP
2345 Grand Blvd, Suite 2200
Kansas City, MO 64108-2684
Telephone: 816-460-5329
Fax: 816-292-2001
Email: bholland@lathropgage.com

Dated: July 7, 2015

Attorney for Receiver Larry E. Cook